

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION**

James E. McCabe)	Chapter 13
Angela M. McCabe)	
Debtors)	Case No. 23-70100

MOTION TO CONVERT CHAPTER 13 CASE TO CHAPTER 7

Come now the Debtors, Jams E. McCabe and Angela M. McCabe, by counsel, and apply to convert their Chapter 13 case to a case under Chapter 7 for the reasons and upon the grounds shown below:

1. The male Debtor has lost his job and the Debtors are no longer able to comply with the requirements of their Chapter 13 plan and hereby give notice of their intention and desire to convert their Chapter 13 case to a case under Chapter 7.
2. Under 11 USC 1307(a) Debtors may convert a case under Chapter 13 to a case under Chapter 7 of Title 11, United States Code at any time, and the Debtors, by this application, hereby exercise their right to convert their Chapter 13 case to a case under Chapter 7.

WHEREFORE, the Debtors pray that this Chapter 13 case be promptly converted to a case under Chapter 7.

James E. McCabe
Angela M. McCabe
-By counsel-

/s/ Shane W. Hiatt
Shane W. Hiatt (VSB#88471)
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CERTIFICATE OF SERVICE

This is to certify that on April 18, 2023, I mailed a true copy of the Motion to Convert Chapter 13 case to Chapter 7 by first class mail postage paid to the debtors and creditors and electronically via the CM/ECF system to the Chapter 13 Trustee and Office of the U. S. Trustee.

/s/ Shane W. Hiatt

Shane W. Hiatt